

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas

FILED

JUL 01 2015

Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
 Oscar Ivan ROMERO-Martinez
 YOB: 1982
 Citizenship: Mexico

Case No.

M-15-1065-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 30, 2015 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324 (a)(1)(A)(iii)

Knowing and in reckless disregard of the fact that Hector Sanchez-Sosa, Edward Rey Del Valle-Toro and Ingrid Lorena Grijalba were aliens, who had come to, entered and remained in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such aliens in any place, including any building or any means of transportation; to wit a residence in Mission, Texas.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

Amored




 Complainant's signature

Tomas Mora, HSI Special Agent
 Printed name and title

Sworn to before me and signed in my presence.

Date: 7/1/2015


 Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos
 Printed name and title

ATTACHMENT A

On June 30, 2015, at approximately 1330 hours, the Office of Border Patrol, McAllen, Texas (OBP McAllen), Agents were conducting surveillance of an apartment complex located at 2005 Angus Street, Mission, Texas, when they observed a male subject depart the area in a black Ford Fusion (paper tags: 49R5814). OBP Agents requested assistance from the Alton Police Department in conducting a traffic stop of the black Ford Fusion. The driver of the black Ford Fusion was identified by OBP Agents as a juvenile being illegally present in the United States and was arrested for administrative violations of immigration law.

While conducting surveillance of the apartment complex OBP Agents identified a Hummer H3 (TXLP: BMZ2833) parked in the parking lot. Records checks conducted on the Hummer H3 resulted in notification that the vehicle was reported stolen out of Edinburg, Texas. OBP Agents notified the Edinburg Police Department concerning the stolen vehicle and its location at the apartment complex.

Edinburg Police Department (EPD) Investigators responded to the apartment complex in an attempt to identify any subjects with information concerning the stolen Hummer H3. EPD Investigators knocked on the apartment door (Apt. B) that was closest to the parked stolen Hummer H3 when three (3) subjects, to include Oscar Ivan ROMERO-Martinez, fled the residence out of the back door. OBP Agents apprehended these subjects away from the apartment complex and determined all three (3) to be illegally present in the United States.

EPD Investigators obtained consent to search Apt. B and discovered fourteen (14) subjects inside the residence. OBP Agents identified all fourteen (14) subjects to be illegally present in the United States. All subjects were transported to the OBP McAllen Station for interviews and processing.

OBP Agents conducted a post-Miranda interview of ROMERO-Martinez in which ROMERO-Martinez denied involvement in harboring the UDAs at the apartment. ROMERO-Martinez stated he was a harbored UDA awaiting transport further north into the United States. ROMERO-Martinez stated he told the UDAs to be quiet while in the stash house but not because he was in charge of the residence.

Hector Sanchez-Sosa, a citizen of Mexico with no legal status to be in the United States, identified ROMERO-Martinez on a 6 person photo line-up as being in charge of the harbored UDAs. Sanchez-Sosa stated ROMERO-Martinez would bring food to the residence, forced him to cook for the harbored UDAs and told him to bring the cooked food to the harbored UDAs in their bedroom. Sanchez-Sosa stated ROMERO-Martinez separated the male and female UDAs into different rooms and that ROMERO-Martinez would stay in the room with the harbored female UDAs. Sanchez-Sosa stated ROMERO-Martinez would tell the UDAs to keep quiet so that the neighbors wouldn't hear them and call the police.

Edward Ray Valle-Tello, a citizen of Guatemala with no legal status to be in the United States, identified ROMERO-Martinez on a 6 person photo line-up as being the subject who provided food to the harbored UDAs, told them not to make any noise, not to leave the residence, not to look out the window and not to have the volume on the television loud. Valle-Tello stated ROMERO-Martinez would get mad at the harbored UDAs if they didn't pay attention to him. Valle-Tello stated ROMERO-Martinez separated the male and female UDAs into different rooms and that ROMERO-Martinez would stay in the room with the female UDAs. Valle-Tello stated ROMERO-Martinez would get mad at the harbored male UDAs when they spoke to the harbored female UDAs. Valle-Tello stated that on Sunday, June 28, 2015, ROMERO-Martinez went into the room where the harbored UDAs were being kept and told the UDAs which ones would be leaving. Valle-Tello stated these UDAs subsequently left the residence to be smuggled further north by ROMERO-Martinez.

Ingrid Lorena Grijalba, a citizen of Guatemala with no legal status to be in the United States, identified ROMERO-Martinez on a 6 person photo line-up as being the subject who told her not to make noise while in the residence and that he would also bring her food. Grijalba stated ROMERO-Martinez told her she would be sleeping in the same room with him along with other harbored female UDAs. Grijalba stated ROMERO-Martinez told her that she would be smuggled further north on the date of her arrest, June 30, 2015, at 7:00 pm on orders of "EL TIGRE".